

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**KLAUBER BROTHERS, INC.,**

Plaintiff,

*~ versus ~*

**THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

Defendants.

Case No. 1:23-cv-10407

**District Judge** Thomas M. Durkin

**Magistrate Judge** Keri L. Holle Hotaling

**NOTICE OF MOTION  
UNOPPOSED MOTION BY  
DONGYAN SHENGYU ELECTRONIC COMMERCE CO., LTD.  
FOR MISCELLANEOUS RELIEF  
IN PREPARATION FOR THE HEARING ON DECEMBER 19, 2023**

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure 43(a), the practices of this Honorable Court and other relevant rules and practices of this Court, Dongyan Shengyu Electronic Commerce Co. Ltd. shall appear before the Honorable District Judge Thomas M. Durkin, of the United States District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago Illinois at such time as this matter may be heard and shall present the following Motion:

Motion by Dongyan Shengyu Electronic Commerce Co. Ltd. for an Order:

- Granting Leave, to the extent Leave is required for Counsel, their staff, and any witnesses, to introduce into the Courthouse a laptop, a cellphone, an HDMI cable, and other related cords, chargers and electronics equipment for use only during the Hearing on December 19, 2023.

At no time shall any recording or video/photographic recording feature be used on any of the electronics; and the electronics shall not be used in a manner that is disruptive to the Court, Counsel or any other party.

*(Consented to by Plaintiff)*

- Granting Leave pursuant to Rule 43(a), for witnesses located overseas who after good faith efforts were unable to secure flights to Chicago to appear for testimony, to appear and testify via Zoom or any other program that allows all parties to see and be seen, and to hear and be heard in real time.

*(Consented to by Plaintiff)*

**Dated:** December 6, 2023

RESPECTFULLY SUBMITTED,

By:



---

Baruch S. Gottesman, Esq.  
New York Bar No. 4480539  
GOTTESMAN LEGAL PLLC  
11 Broadway, Suite 615  
New York, NY 10004  
Phone: (212) 401-6910  
Fax: (212) 859-7307  
[bg@gottesmanlegal.com](mailto:bg@gottesmanlegal.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2023, simultaneous with the filing of this Submission, a copy of this submission was served upon counsel for all Appearing Parties using the court's CM/ECF system which will provide a notice of electronic filing to the following counsel of record of consent in writing to accept this notice of service of this document by electronic means:

**Mackenzie Paladino, Esq.**

**Trevor Barrett**

DONIGER / BURROUGHS

247 Water Street, First Floor

New York, NY 10038

Phone: (310) 590-1820

Email: <[Mpaladino@donigerlawfirm.com](mailto:Mpaladino@donigerlawfirm.com)>

<[Tbarrett@donigerlawfirm.com](mailto:Tbarrett@donigerlawfirm.com)>

*Counsel for Plaintiff*

**Ruoting Men, Esq.**

**Tao Liu, Esq.**

GLACIER LAW LLP

41 Madison Avenue, Suite 2529

New York, NY 10010

Phone: (332) 270-0413 / (332) 208-1505

Email: <[Ruoting@glacier.law](mailto:Ruoting@glacier.law)>

<[Tao.Liu@glacier.law](mailto:Tao.Liu@glacier.law)>

*Counsel for Defendant Shenzhen Lingyun Network Technology Co., Ltd.  
doing business as | RSLOVE /*

**Adam Edward Urbanczyk, Esq.**

AU LLC

444 West Lake, 17th Floor

Chicago, IL 60606

Phone: (312) 715-7312

Email: [AdamU@au-LLC.com](mailto:AdamU@au-LLC.com)

*Counsel for Defendants BOAO Network, Skylety Direct, and Iertree*

**Gei Li**

GETECH LAW LLC

203 N. LaSalle, Unit 2100

Chicago, IL 60601

Phone: (312) 888-6633

Email: [Linda.Lei@gettechlaw.com](mailto:Linda.Lei@gettechlaw.com)

*Counsel for Defendant Suzhou BSL Garments Co., Ltd. (Amazon store jack smith)*

**Timothy Alan Duffy**

LAW OFFICE OF TIMOTHY A. DUFFY, P.L.

725 W. Orchard Cir. 60045

Phone: (847) 530-4920

Email: [Tduffy@tduffylaw.com](mailto:Tduffy@tduffylaw.com)

*Counsel for Defendant Cheng Du Ruiland Tianhui Keji Youzhangongsi*